



BELLUCK LAW

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February 24, 2025

Hon. Sanket J. Bulsara
United States District Court Judge
100 Federal Plaza, Room 930
Central Islip, NY 11722
Bulsara_chambers@nyed.uscourts.gov

Re: Bruno v. Zimmer Biomet Holdings, Inc. et al
Case No. 2:25-cv-00387-SJB-SIL

Honorable Judge Bulsara:

We represent the Plaintiff in the above referenced matter. This letter is in response to the Court's text order dated February 12, 2025 and accompanies plaintiff's filing of his Amended Complaint in accordance with Rule 15(b)(2). During the course of our file review and the drafting of the Amended Verified Complaint, Plaintiff has made the determination that not only does he assert viable medical malpractice claims against Glen Cove Hospital but also alleges medical malpractice claims against two additional Defendants, Syosset Hospital and Northwell Health who plaintiff believes are essential parties to the action. As such, the plaintiff has now amended its complaint to assert claims against both Syosset Hospital and Northwell Health for medical malpractice in addition to Glen Cove Hospital.

Accordingly, plaintiff respectfully requests that this matter be remanded back to Supreme Court of the State of New York, Nassau County, pursuant to 28 U.S.C. §1447(c) as diversity of jurisdiction does not exist and as such this Court lacks Subject Matter Jurisdiction over this action.

We thank the Court for its consideration of this request.

Respectfully submitted,

Harris Marks
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cc: all parties by ECF